

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case 32-CA-236025

Date Filed
2/14/2019

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Google LLC	b. Tel. No.
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code) 1600 Amphitheatre Parkway Mountain View, CA 94043 (Note: Please address communications to Harry Johnson III, whose address is to the right.)	e. Employer Representative Harry Johnson III 2049 Century Park East Suite 700 Los Angeles, CA 90067-3109 Email: harry.johnson@morganlewis.com
	g. e-mail See box 1(e), to the left.
	h. Number of workers employed approximately 85,000
i. Type of Establishment (factory, mine, wholesaler, etc.) Technology company	j. Identify principal product or service Search engine and other internet services
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (4) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See attachment.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) (b) (6), (b) (7)(C), an individual	
4a. Address (Street and number, city, state, and ZIP code) (b) (6), (b) (7)(C)	4b. Tel. No. (b) (6), (b) (7)(C)
	4c. Cell No.
	4d. Fax No.
	4e. e-mail (b) (6), (b) (7)(C)
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief. (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) _____ (Print/type name and title or office, if any)	
Tel. No. (b) (6), (b) (7)(C)	
Office, if any, Cell No.	
Fax No.	
e-mail (b) (6), (b) (7)(C)	
Address (b) (6), (b) (7)(C) Date February 13, 2019	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Attachment to Charge Against Employer

Re: Google LLC

Basis of Charge

1. The employer has interfered with, restrained, and coerced employees in the exercise of the rights guaranteed in section 7 of the Act, and continues to do so, by these and other acts:
 - a) threatening the Charging Party with reprisals, and otherwise discriminating against (b) (6), (b) (7)(C) (including sending (b) (6), (b) (7)(C) an email titled "Final warning regarding the trans-community@ list" containing defamatory and pretextual statements), because of (b) (6), (b) (7)(C) having exercised the rights guaranteed in section 7 of the Act and because of (b) (6), (b) (7)(C) having filed charges with the NLRB and given testimony in support of such charges; and
 - b) maintaining, enforcing, and threatening to enforce, a policy titled "Guidelines for trans-community@ and trans-announce@" that impairs the labor policy of the United States, as enacted by Congress, by, among other things:
 - i. enjoining employees from disclosing anything that is discussed on certain of the employer's electronic forums, even though many topics on the forums relate to the employer's working conditions;
 - ii. prohibiting employees from filing charges with the NLRB (including charges against the employer) and also from furnishing the NLRB with evidence in support of such charges;
 - iii. obstructing effective discussion, prosecution, and resolution, of labor complaints, by requiring employees to "communicate with care" and refrain entirely from ever using any language with "legal connotations"; and
 - iv. stating that employees who violate the guidelines will be referred to the employer's HR department for discipline.